

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF FLORIDA**

MIAMI DIVISION

MIAMI DOLPHINS, LTD. and
SOUTH FLORIDA STADIUM LLC,

Plaintiffs,

vs.

FIRST CLASS CRUISES, LLC and
JEFFREY NAHOM, individually,

Defendants.

Civil Case No. 1:23-cv-21514-BB

**MOTION FOR CLERK'S ENTRY OF DEFAULT
AGAINST DEFENDANT JEFFREY NAHOM**

Pursuant to Federal Rule of Civil Procedure 55(a), Plaintiffs Miami Dolphins, Ltd. and South Florida Stadium LLC file this Motion for Clerk's Entry of Default Against Defendant Jeffrey Nahom, and state as follows:

Defendant Jeffrey Nahom was served with a copy of the summons and complaint, including exhibits, on April 29, 2023 [D.E. 8]. Pursuant to Federal Rule of Civil Procedure 12, Mr. Nahom was required to serve a responsive pleading or motion on or before May 22, 2023. Mr. Nahom has failed to file a responsive pleading or motion within the time allowed under the Federal Rules of Civil Procedure.

WHEREFORE, Plaintiffs Miami Dolphins, Ltd. and South Florida Stadium LLC respectfully request that the Clerk enter default against Defendant Jeffrey Nahom.

Dated: May 23, 2023

Respectfully submitted,

By: /s/ Matthew W. Tieman

Melissa C. Pallett-Vasquez

Fla. Bar No.: 0715816

Matthew W. Tieman

Fla. Bar No.: 1044909

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*Counsel for Plaintiffs Miami Dolphins, Ltd.
and South Florida Stadium LLC*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 23, 2023, a true and correct copy of the foregoing was electronically filed and also was served via regular U.S. Mail on Defendants as follows:

First Class Cruises, LLC
by serving its managing member, Jeffrey Nahom
154 Jericho Valley Dr.
Newtown, PA 18940

Jeffrey Nahom
154 Jericho Valley Dr.
Newtown, PA 18940

By: /s/ Matthew W. Tieman

Matthew W. Tieman